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May 17, 2007

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW, Room TWB-204  
Washington, DC 20554

Re: Implementation of the Telecommunications Act of 1996 – Telecommunications Carriers' Use of Customer Proprietary Network Information and other Customer Information, CC Docket No. 96-115

Dear Ms. Dortch:

Yesterday, Eric Loeb, Davida Grant and I, all of AT&T, met with Scott Bergmann, Legal Advisor to Commissioner Adelstein, and Scott Deutchman, Legal Advisor to Commissioner Copps. In these meetings, we discussed AT&T's concerns with potential Commission rules that would restrict the foreign storage of CPNI generated in the United States.

AT&T explained that since the Commission last sought industry comment on this issue in 2002, the telecommunications market has evolved increasingly as a global market and as a result, the record should be refreshed to reflect this transformation. We described AT&T's global business services and expressed our concern that a foreign storage prohibition, without certain public-policy based exemptions, would impede AT&T's ability to serve its multinational corporate customers in the manner they demand. Additionally, we raised the concern that a foreign storage prohibition would adversely impact international trade policy and place the US communications industry at a competitive disadvantage in the global marketplace. AT&T believes that through a refreshed record, industry and government can identify more narrowly-tailored ways to satisfy the legitimate interests in protecting the security and privacy of CPNI, while also allowing trans-border commerce that meets the demands of our communications customers.

One electronic copy of this Notice is being submitted in accordance with Section 1.1206 of the Commission's rules.

Sincerely,

A handwritten signature in black ink that reads "Amy L. Alvarez". The signature is fluid and cursive, with the first name "Amy" and last name "Alvarez" clearly legible.

cc: Scott Bergmann  
Scott Deutchman